

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET**

Debtors: SB Building Associates Limited  
Partnership, SB Milltown Industrial  
Realty Holdings, Alsol Corporation

Applicant: Norris McLaughlin, P.A.

Case Nos.: 13-12682 (VFP)  
13-12685 (VFP)  
13-12689 (VFP)

Clients: SB Building Associates Limited  
Partnership, SB Milltown Industrial  
Realty Holdings, Alsol Corporation

Chapter: 11

Case Filed: February 11, 2013

**SECTION 1  
FEE SUMMARY**

☐ Interim Fee Application No. \_\_\_\_\_ or ☒ Final Fee Application

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fee Requested	\$ <u>625,670.00</u>	\$ <u>12,526.54</u>
Total Fees Allowed To Date:	\$ <u>625,456.00</u>	\$ <u>12,526.54</u>
Total Retainer (If Applicable)	\$ <u>-0-</u>	\$ <u>-0-</u>
Total Holdback (If Applicable)	\$ <u>-0-</u>	\$ <u>-0-</u>
Total Received By Applicant	\$ <u>249,732.03</u>	\$ <u>5,267.97</u>

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (OR YEARS OF PROFESSIONAL SERVICE)	HOURS	RATE	FEE
<b>SB Building Associates Limited Partnership</b>				
1. Morris S. Bauer	1989(NY)/1990(NJ)	119.70	550.00	65,835.00
2. Rebecca Price		5.00	265.00	1,325.00
<b>SB Milltown Industrial Realty Holdings, LLC</b>				
1. Morris S. Bauer	1989(NY)/1990(NJ)	0.60	550.00	330.00
<b>Alsol Corporation</b>				
1. Morris S. Bauer.	1989(NY)/1990(NJ)	0.60	550.00	330.00
<b>TOTAL</b>		125.90		67,820.00

Fee Totals:	\$ <u>67,820.00</u>
Disbursement Totals:	\$ <u>1,082.92</u>
Total Fee Application	\$ <u>68,902.92</u> <sup>1</sup>

<sup>1</sup> Assuming NM is awarded in full the request set forth herein, NM's final fee award would be fees of \$693,276.00 and expenses of \$13,609.46. NM has received \$255,000.00 to date and will be owed \$451,885.46.

**SECTION II  
SUMMARY OF SERVICES**

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEE</b>
a) <b>Asset Analysis and Recovery</b> Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work		
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.		
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) <b>Case Administration</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, lists of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	8.10	4,455.00
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to establish interim procedures.	1.90	1,045.00
i) <b>Fee/Employment Objections</b> Review of an objection to the employment and fee applications of others.		
j) <b>Financing</b> Matters under 361, 363, and 364 including cash collateral and secured claims; loan document analysis.		
k) <b>Litigation</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	1.20	660.00
l) <b>Meeting of Creditors</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' meetings.		
m) <b>Plan and Disclosure Statement</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	106.50	57,150.00
n) <b>Relief from Stay Proceedings</b> Matters relating to termination or continuation of automatic stay under 362.		

o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and bringing accounting current.		
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.		
v) <b>Valuation</b> Appraise or review appraisals of assets.		
w) <b>Travel Time</b>	8.20	4,510.00
<b>SERVICE TOTALS:</b>	125.90	67,820.00

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing Fees</b> Payable to Clerk of Court	
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and description of manner calculated.	549.63
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print	
d) <b>Fax</b> No. of Pages ___ Rate per Page <u>1.00</u> (Max. \$1.00/pg.)	
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges.	
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	
g) <b>Outside Reproduction Services</b> Including scanning services.	
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurant.	
i) <b>Court Reporting</b> Transcripts.	
j) <b>Travel</b> Mileage, tolls, airfare, parking.	486.95
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	
l) <b>Postage</b>	46.34
m) <b>Other (specify) Transcripts</b>	
<b>DISBURSEMENTS TOTAL:</b>	1,082.92

I certify under penalty of perjury that the above is true and correct.

Date: July 2, 2019

/s/ Morris S. Bauer  
SIGNATURE

10389410-1

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>	
<b>MORRIS S. BAUER</b> <b>NORRIS McLAUGHLIN, P.A.</b> Former Counsel for the Debtors/Debtors-in-Possession 400 Crossing Boulevard, 8 <sup>th</sup> Floor PO Box 5933 Bridgewater, NJ 08807-5933 (908) 722-0700	
In Re:	Case Nos.: 13-12682 (VFP) 13-12685 (VFP) 13-12689 (VFP)
S B BUILDING ASSOCIATES LIMITED PARTNERSHIP, SB MILLTOWN INDUSTRIAL REALTY HOLDINGS, LLC, and ALSOL CORPORATION,	Judge: Hon. Vincent F. Papalia
Debtors.	Chapter: 11

**APPLICATION OF NORRIS McLAUGHLIN, P.A. FOR FINAL  
ALLOWANCES TO ATTORNEYS FOR DEBTORS**

TO: THE HONORABLE VINCENT F. PAPALIA  
UNITED STATES BANKRUPTCY JUDGE

The Application of Norris McLaughlin, P.A. f/k/a Norris, McLaughlin & Marcus, P.A.

(“NM” or “Your Applicants”), respectfully shows unto Your Honor and alleges:

1. Your Applicants are attorneys of the State of New Jersey, duly admitted to practice before this Honorable Court.

2. Your Applicants further show that on February 11, 2013, S B Building Associates Limited Partnership (“S B Building”), SB Milltown Industrial Realty Holdings, LLC. (“SB Milltown”), and Alsol Corporation, (“Alsol”, and together with S B Building, and SB Milltown, the “Debtors”) each filed a voluntary petition for reorganization pursuant to chapter 11 of the United

States Bankruptcy Code (the “Chapter 11 Cases”), and at that time were continued in possession of their assets.

3. Your Applicants further show that on March 5, 2013, Orders were entered in the Chapter 11 Cases authorizing the retention of NMM as counsel to each of the Debtors. Copies of said orders are annexed hereto as Exhibit “A”.

4. Your Applicants further show that on June 25, 2019, the Court entered an Order relieving NM as counsel to the Debtors.

5. Your Applicants further show that the services rendered in conjunction with these matters between January 1, 2019 and June 24, 2019, included the following, *inter alia*:

- (a) Conferences with representatives of the Debtors regarding, the USEPA claim, settlement with the USEPA, settlement with Cherry Tree and Sass, Milltown Litigation, and the Fourth Modified Plan; Confirmation process; discovery; Confirmation hearing and initial Confirmation brief and briefs filed by the UST and Boraie;
- (b) Attend settlement conference/meetings and Court status conferences;
- (c) Review and discuss with client current status of Milltown litigation;
- (d) Continue with confirmation hearing, including preparation of witness, legal research; attendance at several hearings;
- (e) Review and file monthly operating reports prepared by Debtors;
- (f) Review transcripts in detail and prepare initial confirmation brief; and
- (g) Numerous conversations with representatives from the Office of the United States Trustee and other parties in interest regarding the Chapter 11 Cases.

6. Your Applicants further show that annexed hereto as Exhibit “B”, “C”, “D” are computer printouts itemizing all services performed by members and associates of NM for the period commencing January 1, 2019 through June 24, 2019 in S B Building, SB Milltown and Alsol respectively. As shown on said exhibit, NMM devoted in excess of 125.90 hours of services having

a value of \$67,820.00 at this firm's then existing billing rates. The names of the attorneys and the paralegals involved in this matter, their hourly billing rates. The names of the attorneys involved in this matter, their hourly billing rates, the time spend by each of them and the total fees resulting therefrom are as follows:

<b>SB Building Associates Limited Partnership</b>	<b>Hours Spent</b>	<b>Hourly Rate</b>	<b>Amount</b>
1. Morris S. Bauer	119.70	550.00	65,835.00
2. Rebecca Price	5.00	265.00	1,325.00
 <b>SB Milltown Industrial Realty Holdings, LLC</b>			
1. Morris S. Bauer	0.60	550.00	330.00
 <b>Alsol Corporation</b>			
1. Morris S. Bauer.	0.60	550.00	330.00
 <b>TOTAL</b>	 <b>125.90</b>		 <b>67,820.00</b>

7. Your Applicants further show that they have incurred out-of-pocket expenses in the sum of \$1,082.92.

8. Your Applicants further show that on August 6, 2013, Your Applicants filed their first interim fee application requesting fees in the amount of \$21,064.50 and reimbursement of expenses in the amount \$3,840.08. On September 17, 2013, the Court entered an Order Granting First Interim Allowances Pursuant to § 331 of the Bankruptcy Code Re: Norris McLaughlin & Marcus, P.A. by which Your Applicants were awarded fees in the amount of \$21,064.50 and reimbursement of expenses in the amount of \$3,840.08 (the "First Interim Fee Order").

9. Your Applicants further show that on January 27, 2014, Your Applicants filed their second interim fee application requesting fees in the amount of \$25,852.50 and reimbursement of expenses in the amount \$504.18. On February 20, 2014, the Court entered an Order Granting Second Interim Allowances Pursuant to § 331 of the Bankruptcy Code Re: Norris McLaughlin & Marcus, P.A. by which Your Applicants were awarded fees in the amount of \$25,852.50 and reimbursement of expenses in the amount of \$504.18 (the “Second Interim Fee Order”).

10. Your Applicants further show that on February 3, 2015, Your Applicants filed their third interim fee application requesting fees in the amount of \$82,894.00 and reimbursement of expenses in the amount \$612.28. On March 6, 2015, the Court entered an Order Granting Third Interim Allowances Pursuant to § 331 of the Bankruptcy Code Re: Norris McLaughlin & Marcus, P.A. by which Your Applicants were awarded fees in the amount of \$82,894.00 and reimbursement of expenses in the amount of \$612.28 (the “Third Interim Fee Order”).

11. Your Applicants further show that on January 27, 2016, Your Applicants filed their fourth interim fee application requesting fees in the amount of \$72,123.50 and reimbursement of expenses in the amount \$994.53. On March 2, 2016, the Court entered an Order Granting Fourth Interim Allowances Pursuant to § 331 of the Bankruptcy Code Re: Norris McLaughlin & Marcus, P.A. by which Your Applicants were awarded fees in the amount of \$72,123.50 and reimbursement of expenses in the amount of \$994.53 (the “Fourth Interim Fee Order”).

12. Your Applicants further show that on January 31, 2017, Your Applicants filed their fifth interim fee application requesting fees in the amount of \$73,755.00 and reimbursement of expenses in the amount \$434.62. On March 2, 2017, the Court entered an Order Granting Fifth Interim Allowances Pursuant to § 331 of the Bankruptcy Code Re: Norris McLaughlin & Marcus,



P.A. by which Your Applicants were awarded fees in the amount of \$73,755.00 and reimbursement of expenses in the amount of \$434.62 (the “Fifth Interim Fee Order”).

13. Your Applicants further show that on January 16, 2018, Your Applicants filed their sixth interim fee application requesting fees in the amount of \$173,948.50 and reimbursement of expenses in the amount \$1,496.96. On February 22, 2018, the Court entered an Order Granting Sixth Interim Allowances Pursuant to § 331 of the Bankruptcy Code Re: Norris McLaughlin & Marcus, P.A. by which Your Applicants were awarded fees in the amount of \$173,734.50 and reimbursement of expenses in the amount of \$1,496.96 (the “Sixth Interim Fee Order”).

14. Your Applicants further show that on January 16, 2019, Your Applicants filed their seventh interim fee application requesting fees in the amount of \$176,032.00 and reimbursement of expenses in the amount \$4,643.89. On February 19, 2019, the Court entered an Order Granting Seventh Interim Allowances Pursuant to § 331 of the Bankruptcy Code Re: Norris McLaughlin & Marcus, P.A. by which Your Applicants were awarded fees in the amount of \$176,032.00 and reimbursement of expenses in the amount of \$4,643.89 (the “Seventh Interim Fee Order”).

15. As of this date, Your Applicants have been paid \$255,000. Notwithstanding said payments, pursuant to this Court’s January 2, 2019 order, the Debtors were to have paid NM \$30,000 per month. The Debtors did not comply with this order.

16. Your Applicants certify that the Debtors, through their officers, will have received and will have ample opportunity to review the within application for compensation and reimbursement of expenses.

17. Annexed herewith as Exhibit “E” and made a part hereof is an Affidavit of Morris S. Bauer, Esq. submitted pursuant to § 504 of the Bankruptcy Code.

WHEREFORE, Your Applicants respectfully request that an Order be entered granting Norris McLaughlin, P.A., as attorneys for S B Building Associates Limited Partnership, SB Milltown Industrial Realty Holdings, LLC., and Alsol Corporation final allowances in the amount of \$67,820.00 together with reimbursement of their out-of-pocket expenses in the sum of \$1,082.92 and that the First Interim Fee Order, the Second Interim Fee Order, the Third Interim Fee Order, the Fourth Interim Fee Order, the Fifth Interim Fee Order, the Sixth Interim Fee Order, and the Seventh Interim Fee Order be deemed final pursuant to §330 of the Bankruptcy Code<sup>1</sup>.

NORRIS McLAUGHLIN, P.A.  
Attorneys for Debtors/Debtors-in-Possession

Dated: July 2, 2019

By: /s/ Morris S. Bauer  
MORRIS S. BAUER

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<sup>1</sup> Assuming NM is awarded in full the request set forth herein, NM's final fee award would be fees of \$693,276.00 and expenses of \$13,609.46. NM has received \$255,000.00 to date and will be owed \$451,885.46.